

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRAVIS GAMBERS,

Civil Action No. 1:07-cv-04841-BSJ

Plaintiff,

-against-

**DEMAND FOR PRODUCTION
OF DOCUMENTS AND THINGS**

THE CROWN PARADISE HOTELS,
THE CROWN PARADISE CLUB,
MARINA DE ORO, RESORTS
CONDOMINIUMS INTERNATIONAL, LLC,
FN REALTY SERVICES, INC.,

Defendants.

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PLEASE TAKE NOTICE, that plaintiff, by and through the undersigned attorneys, hereby demand pursuant to F.R.Civ. P 34, that defendants, THE CROWN PARADISE HOTELS, THE CROWN PARADISE CLUB, MARINA DE ORO, produce the following items for discovery and inspection at the office of the undersigned at 10:00 a.m. on September 15, 2007.

PLEASE TAKE FURTHER NOTICE, that this demand includes a specific request for copies of documents, whether they be in hard copy or in the form of electronic records on disk or hard drive, and includes a demand for e-mail records.

1. Copies of any and all ownership records relating to the premises where plaintiff's accident occurred.
2. Copies of any and all advertising materials, brochures, pamphlets, website advertisements, direct mail advertising and all other marketing materials produced by defendants, THE CROWN PARADISE HOTELS, THE CROWN PARADISE CLUB, MARINA DE ORO, for use and/or directed to prospective customers to the United States.
3. Copies of any and all advertising materials, brochures, pamphlets, website advertisements, direct mail advertising and all other marketing materials produced by defendants, THE CROWN PARADISE HOTELS, THE CROWN PARADISE CLUB, MARINA DE ORO, printed in English.

4. Copies of any and all contracts and/or agreements between THE CROWN PARADISE HOTELS, THE CROWN PARADISE CLUB, MARINA DE ORO and any and all co-defendants in this case, including but not limited to RESORTS CONDOMINIUMS INTERNATIONAL, LLC ("RCI").
5. Copies of any and all accident reports, incident reports, written complaints or other written materials generated as a result of plaintiff's accident in the lobby of THE CROWN PARADISE HOTEL/THE CROWN PARADISE BEACH CLUB on September 26, 2006.
6. Copies of any and all written statements, signed or otherwise, given by the plaintiff to his accident at the defendants' premises on September 26, 2007.
7. Copies of any and all written policies, protocols or procedures in place at defendants' hotel/beach club, regarding cleaning and/or mopping of the lobby, floors or other common areas.
8. Copies of any and all contracts, written agreements and/or other documents evidencing the relationship between MARINA DE ORO and either THE CROWN PARADISE HOTEL or THE CROWN PARADISE BEACH CLUB.
9. Copies of any and all contracts, written agreements and/or other documents evidencing the relationship between THE CROWN PARADISE HOTEL and THE CROWN PARADISE BEACH CLUB.
10. Copies of any and all contracts, written agreements and/or other documents evidencing the relationship between MARINA DE ORO, THE CROWN PARADISE HOTEL, THE CROWN PARADISE BEACH CLUB and any of the other defendants in this case.
11. Copies of any and all contracts, written agreements and/or other documents evidencing the relationship between Copies of any and all contracts, written agreements and/or other documents evidencing the relationship between MARINA DE ORO, THE CROWN PARADISE HOTEL, THE CROWN PARADISE BEACH CLUB and any advertising companies, marketing companies, internet marketing company and direct marketing companies.

Dated: New York, New York
August 3, 2007

ZAREMBA BROWNELL & BROWN PLLC

By:



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